

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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EXPERIMENTAL PREMIUM  
FORWARDING SERVICE

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Docket No. MC2005-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO DAVID B. POPKIN INTERROGATORY, DBP/USPS-T1-51  
(January 5, 2005)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby partially objects to interrogatory DBP/USPS-T1-51, submitted by David B. Popkin on December 22, 2004, which reads as follows:

DBP/USPS-T1-51.

- (a) Please explain, in general, the steps taken in processing mail that arrives at an address in which the customer has filed a Change of Address Order.
- (b) Please indicate the normal time frames for each of the actions to be taken. For example, if a letter arrives at the delivery unit on a Monday, when will that letter be entered into the system with the new address?
- (c) Are forwarded letters normally handled with the same delivery standards [1-, 2-, or 3-days] as other letter mail is?
- (d) If not, please explain.
- (e) Please advise the action taken with each of the classes of mail [for example, First-Class Mail/ Priority Mail/ Express Mail/ Standard Mail/ Package Services/ Periodicals/ etc.] with a temporary vs. permanent Change of Address Order.

The Postal Service objects to this interrogatory on the grounds of relevance and overbreadth. This interrogatory first seeks information concerning temporary and permanent forwarding for "mail that arrives at an address" that is subject to an active

forwarding order.<sup>1</sup> The interrogatory then inquires about delivery standards for forwarded mail and how each class of mail is handled under a forwarding order.

As the Postal Service has consistently noted throughout this proceeding, Premium Forwarding Service (PFS) is technically a reshipping service rather than a forwarding service, and, except as noted below, mail that is reshipped pursuant to PFS would not be handled according to forwarding procedures.<sup>2</sup> As such, the scope of the interrogatory is overbroad, seeking information that is beyond the narrow scope of this proceeding; for example, it is irrelevant how Standard Mail letters are handled under a temporary or permanent forwarding order, because such mail would be bundled and reshipped according to PFS procedures, separate and distinct from forwarding procedures. In addition, PFS is designed simply as an experimental alternative to the existing forwarding options and hold mail; it would not in any way alter the attributes of temporary and permanent forwarding, and it is expected to have a minimal impact on the volume of mail that is forwarded.<sup>3</sup>

At the same time, however, mail that requires a scan at delivery would be handled operationally as if a forwarding order were in effect.<sup>4</sup> As a result, inquiries regarding the forwarding procedures for pieces requiring scans, but only those pieces, are relevant to this proceeding. The Postal Service therefore plans to respond to interrogatory DBP-USPS-T1-51 by providing the requested information, to the extent

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<sup>1</sup> As an initial matter, the vast majority of mail never “arrives at an address” that is the subject of an active forwarding order, for any of several reasons. For example, PARS, a program that the Commission has explored to some extent in previous dockets, can intercept mail subject to a forwarding order before it reaches the delivery unit.

Furthermore, even for such mail that is not re-routed before arriving at the delivery unit, the carrier or box section clerk would typically intercept mail subject to a forwarding order before either taking it on a delivery route or placing it in a specific post office box.

<sup>2</sup> See, e.g., USPS-T-1 at 8-10; Response of Postal Service witness Cobb to DBP/USPS-T1-6.

<sup>3</sup> See USPS-T-4 at 5, 11.

<sup>4</sup> See, e.g., Response of Postal Service witness Cobb to OCA/USPS-T1-22.

possible, as it relates to mail that requires a scan upon delivery. However, the Postal Service objects to expanding the narrow scope of this proceeding into a general examination of temporary and permanent forwarding procedures.

For the foregoing reasons, the Postal Service partially objects to interrogatory DBP/USPS-T1-51 on the grounds of relevance and overbreadth.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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